

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,) CRIM. NO. 04-30033-MAP
)
 vs.)
)
 RAYMOND ASSELIN, SR., et al.)
)
 Defendants.)

MOTION TO CONTINUE DATE TO FILE STATEMENT OF FACTS FOR PSR

The United States of America, by and through Michael J. Sullivan, United States Attorney for the District of Massachusetts, and William M. Welch II, Assistant United States Attorney, hereby files this motion requesting that the date for the Government's Statement of Facts to the U.S. Probation Office be continued to October 6, 2006. As grounds, the Government states that:

1. The facts relating to this case are complex, and it will require a considerable amount of time for the Government to compile its Statement of Facts. The Government will not be able to accurately convey the case to the U.S. Probation Office or the court without additional time.

2. The Government intends to write an omnibus Statement of Facts for all defendants. The last defendants subject to the package plea agreement are scheduled to enter their guilty pleas on September 13, 2006.

Filed this 1st day of September, 2006.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

/s/ William M. Welch II
WILLIAM M. WELCH II
Assistant United States Attorney

CERTIFICATE OF SERVICE

Hampden, ss.

Springfield, Massachusetts
September 1, 2006

I, William M. Welch, Assistant U.S. Attorney, do hereby certify that I have served a copy of the foregoing by mailing said motion to:

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